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July 30, 2008

Honorable Joel Schneider
United States Magistrate Court Judge
MITCHELL H. COHEN-U.S. COURTHOUSE
1 John F. Gerry Plaza
Camden, New Jersey 08101

RECEIVED

JUL 30 2008

JOEL SCHNEIDER
U.S. Magistrate Judge

RE: Church at Pentecost, Inc. v. Planning Board of the City of Camden, et al
U.S.D.C. Docket No. 07 CV 2969 (RMB)


Dear Judge Schneider:

This office represents the plaintiff in the referenced civil action which has been assigned to Your Honor. Under the recent Amended Scheduling Order, all depositions in this matter are to be concluded by July 31, 2008; tomorrow's date. Due to the reluctance of one witness to be served and scheduling problems of the undersigned that arose due to longstanding trials and medical problems with my knee, two of the depositions have not been concluded. I ask that the July 31, 2008 deadline be enlarged thirty (30) days until the end of August.

Your Honor should be aware that progress has been made, with the depositions of both Willie Anderson and Camden Fire Chief Ralph Roberts being scheduled for August 19, 2008 at the Mitchell Cohen Courthouse. Also, the deposition of our client's principal representative, Mr. Verdell, is also set for August 19, 2008 by Mr. Fisher, the attorney for the Planning Board of the City of Camden. Both Mr. Cieslewicz, counsel to the City of Camden and Mr. Fisher, consent to the to our request of the Court. Your indulgence will be greatly appreciated.

We look forward to hearing from the Court on this request. Feel free to contact me should you have any question.

Very truly yours,


KEVIN C. WATKINS, ESQUIRE
KCW/nc

cc: Mark M. Cieslewicz, Esquire
Calvin L. Fisher, Esquire

So Ordered this 30th day
of July, 2008

JOEL SCHNEIDER, USMJ

*Fact discovery extended to
August 29, 2008. Plaintiff's
expert reports due September 15, 2008.
Defendants' expert reports due
October 15, 2008. Expert
depositions to be completed
by October 31, 2008.
Dispositive motions shall
be filed by November 17, 2008.*